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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

Case No. 19-30088 (DM) (Lead Case)

Chapter 11

(Jointly Administered)

- ☒ Affects Both Debtors
- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company

**NOTICE OF JOINDER BY CLAIMANTS
IN THE SECURITIES PLAINTIFFS'
MOTION FOR THE APPLICATION OF
BANKRUPTCY RULE 7023 AND THE
CERTIFICATION OF A CLASS OF
SECURITIES CLAIMANTS**

Date: August 8, 2023
Time: 10:00 a.m. (Pacific Time)
Before: Video Conference

Objection Deadline: July 25, 2023,
4:00 p.m. (Pacific Time)

1 Accounts on Schedule A (“**Claimants**”), the holders of Securities Claims and creditors in
2 the chapter 11 bankruptcy cases (the “**Chapter 11 Cases**”) of the above-captioned reorganized
3 debtors (the “**Debtors**”), hereby submit this Notice of Joinder (the “**Joinder**”) to *Securities*
4 *Plaintiffs’ Motion for the Application of Bankruptcy Rule 7023 and the Certification of a Class of*
5 *Securities Claimants* (the “**Rule 23 Motion**”) [Docket No. 13865].¹ In support of this Joinder,
6 Claimants respectfully state as follows:

7 **JOINDER AND RESERVATION OF RIGHTS**

- 8 1. Claimants have reviewed the Rule 23 Motion, join it in full, and reserve all rights.
- 9 2. Claimants strongly agree with the Securities Plaintiffs that class certification is the
10 only way to effectuate the fair and expeditious resolution of all pending Securities Claims. For the
11 reasons explained in the Rule 23 Motion, Claimants agree that class certification would ameliorate
12 the myriad problems and obvious inefficiencies that will arise if all Securities Claimants with
13 pending Securities Claims must pursue the merits of their claims individually. Claimants further
14 agree that Securities Claimants, the Reorganized Debtors, and the Court will all benefit from the
15 procedures and protections provided by class certification under Rule 23.
- 16 3. Claimants believe that the Securities Plaintiffs, along with their counsel, have
17 demonstrated their willingness and ability to serve as class representatives and class counsel. Thus,
18 it is Claimants’ position that the Rule 23 Motion should be granted.

19 **CONCLUSION**

20 For all of the foregoing reasons, Claimants respectfully join the Rule 23 Motion.

21 Dated: July 24, 2023

Respectfully submitted,

22 By: 

23 Catherine Yang, Assistant Secretary, Authorized
Signatory

24 Numeric Investors LLC, on behalf of
25 the accounts on Schedule A

26
27
28 ¹ Capitalized terms not defined herein shall have the meaning ascribed to them in the Rule 23 Motion.

SCHEDULE A

| Claimant | Claim Number |
|--|---------------------|
| Man Numeric Amplified Core LLC | 104181 |
| Man Numeric Alternative Risk Premia Value | 104190 |
| Stichting Depositary APG Developed Markets Equity Pool | 104186 |
| Sumitomo Mitsui Trust Bank (SMTB) | 104195 |
| Pacific Gas and Electric Company | 104151 |
| Pacific Gas and Electric Company | 104183 |
| Alphas Managed Accounts Platform LXXI Limited - Risk Premia Segregated Portfolio | 104145 |